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Attorneys for Defendant
FALLS LAKE NATIONAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

1 Plaintiffs Golden Opportunity Investments, LP and Pama Management, Inc.'s ("Plaintiffs")
 2 and Defendant Falls Lake National Insurance Company ("Defendant") (collectively "the Parties"), by
 3 and through their counsel of record stipulate to modifying the scheduling order as follows:

4 Pursuant to deadlines set by the Court, the current case management schedule is as follows:

DISCOVERY	
Expert disclosures	January 24, 2022
Fact Discovery Cutoff	February 8, 2022
Rebuttal expert disclosures	February 23, 2022
Expert Discovery Cutoff	April 22, 2022
MOTIONS	
Deadline to file Motion for Summary Judgment	May 23, 2022
TRIAL	
Joint Notice of Trial Readiness	March 24, 2022

18 This schedule is identical to the Court's original schedule, except the Parties stipulated to
 19 continue the fact discovery cutoff from November 2021 to the current deadline in February 2022 so
 20 that the Parties could participate in mediation. The Court granted that request. *See* ECF No. 11. After
 21 an exchange of written discovery and documents, the Parties attended a mediation session on
 22 November 30, 2021 but were unable to resolve the dispute.

23 The Parties have conferred about the additional discovery needed to prepare for trial and
 24 stipulate to extend the deadlines by approximately six months. The Parties request the following case
 25 management deadlines:

DISCOVERY	
Fact Discovery Cutoff	May 27, 2022
Expert disclosures	July 29, 2022
Rebuttal expert disclosures	August 26, 2022
Expert Discovery Cutoff	October 28, 2022
MOTIONS	
Deadline to file Motion for Summary Judgment	December 2, 2022
TRIAL READINESS	
Joint Notice of Trial Readiness	September 30, 2022

Good cause exists for this request because the Parties need additional time to complete fact discovery before serving expert disclosures, and, except for one extension of the fact discovery cutoff, this is the Parties' first request to extend case management deadlines. The Parties do not anticipate requesting other extensions.

SO STIPULATED.

Dated: January 12, 2022

HESS BOWER ADAMS-HESS, PC

By: /s/ Pamela A. Bower
 RANDY M. HESS
 PAMELA A. BOWER
 Attorneys for Plaintiffs
 GOLDEN OPPORTUNITY INVESTMENTS,
 LP and PAMA MANAGEMENT, INC.

Dated: January 12, 2022

HINSHAW & CULBERTSON LLP

By: /s/ Travis Wall
 MARIA S. QUINTERO
 TRAVIS WALL
 Attorneys for Defendant
 FALLS LAKE NATIONAL INSURANCE
 COMPANY

FILER'S ATTESTATION

I, Travis Wall, am the ECF user whose identification and password are being used to file this STIPULATION AND [PROPOSED] ORDER MODIFYING SCHEDULING ORDER. I hereby attest that all party signatories hereto concur in this filing.

/s/ Travis Wall
TRAVIS WALL

ORDER

Pursuant to stipulation, and good cause appearing, it is so ordered that the case management deadlines are modified as follows:

DISCOVERY		
	CURRENT DEADLINE	NEW DEADLINE
Fact Discovery Cutoff	February 8, 2022	May 27, 2022
Expert disclosures	January 24, 2022	July 29, 2022
Rebuttal expert disclosures	February 23, 2022	August 26, 2022
Expert Discovery Cutoff	April 22, 2022	October 28, 2022
MOTIONS		
	CURRENT DEADLINE	NEW DEADLINE
Deadline to file Motion for Summary Judgment	May 23, 2022	November 14, 2023
TRIAL READINESS		
	CURRENT DEADLINE	CURRENT DEADLINE
Joint Notice of Trial Readiness	March 24, 2022	September 16, 2022

SO ORDERED.

DATED: January 12, 2022

Troy L. Nunley
United States District Judge